

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

EMORY STEVE BROWN,	*	CASE NUMBER:
	*	3:05 CV 0681-C
Plaintiff,	*	
	*	
v.	*	
	*	
CLAIMS MANAGEMENT, INC.,	*	
	*	
Defendant.	*	

MOTION OF DEFENDANT CLAIMS MANAGEMENT, INC. TO EXTEND
DEADLINE TO IDENTIFY EXPERTS AND PROVIDE EXPERT REPORTS
FOR 20 DAYS TO AND INCLUDING MARCH 21, 2006

COMES NOW the defendant, Claims Management, Incorporated (hereinafter referred to as "defendant CMI") and in support of its Motion to Extend Deadline to Identify Experts and Provide Expert Reports, shows unto the Court as follows:

1.

The defendant CMI's deadline to identify experts and provide expert reports is presently set for March 1, 2006.

2.

The defendant CMI has not yet received all of the records requested from the plaintiff's medical providers. Receipt of these records is essential for the defendant CMI to identify a proper expert and ensure that the expert is fully and adequately informed prior to submitting his report.

3.

Plaintiff's counsel has agreed to extension of this deadline.

WHEREFORE, the defendant CMI respectfully moves this Court for an

extension of the deadline to identify experts and provide expert reports for 20 days to and including March 21, 2006.

1923306v.1

This 16th day of February, 2006.

Respectfully submitted,

CARLOCK, COPELAND, SEMLER
& STAIR, LLP

BY: /s/ Jeffrey A. Brown

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CERTIFICATE OF SERVICE

I, Jeffrey A. Brown, do hereby certify that I am of counsel for the defendant Claims Management, Inc. and that I have served a copy of the above and foregoing MOTION OF DEFENDANT CLAIMS MANAGEMENT, INC. TO EXTEND DEADLINE TO IDENTIFY EXPERTS AND PROVIDE EXPERT REPORTS FOR 20 DAYS TO AND INCLUDING MARCH 21, 2006, upon all counsel of record via electronic filing and by depositing a true copy of same in the United States mail, postage prepaid, in an envelope addressed to opposing counsel as follows:

John A. Tinney, Esquire
Post Office Box 1340
Roanoke, Alabama 36274

This 16th day of February, 2006.

/s/ Jeffrey A. Brown
Of Counsel for Defendant, Claims
Management, Inc.